



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

JUN 10 2002

Mr. John Mardigian
ChemTreat, Inc.
10040 Lickinghole Road
Ashland, VA 23005

Ref. No. 01-0286

Dear Mr. Mardigian:

This responds to your letter regarding marking requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) for Intermediate Bulk Containers (IBCs) having capacities of 75, 275, 300, or 400 gallons. Specifically, you asked if marking the proper shipping name of a hazardous material in 50 mm (2.0 inches) letters on an IBC, by stenciling, is required; or, would such information already included on a product label affixed to an IBC satisfy the marking requirements. In a subsequent telephone conversation, with a member of my staff, you said that the 75 gallon capacity container was a non-bulk packaging, not an IBC.

An IBC must be marked with an identification number as specified in §§ 172.302, 172.331 and 172.332. The size of an identification number marking on an IBC must have a width of at least 4.0 mm (0.16 inch) and, with a capacity of less than 3,785 L (1,000 gallons), a height of at least 25 mm (one inch). An identification number marking for an IBC with a capacity of more than 3,785 L (1,000 gallons) must be at least 50 mm (2.0 inches) in height. For an IBC contained in or on a transport vehicle or freight container, if the identification number marking on the IBC is not visible, the transport vehicle or freight container must be marked as required by § 172.332.

The specific marking provisions for IBCs do not require the proper shipping name of the hazardous material to be marked on an IBC, although such marking is not prohibited (see §172.331). There is also no provision that specifies that the identification number marking must be stenciled on an IBC. The options for display of an identification number marking are prescribed in § 172.332. Thus, an identification number may be displayed on an orange panel, a placard, or a white square-on-point configuration. A product label may not be used to satisfy the identification number marking display on an IBC.



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172.332

The marking requirements for non-bulk packagings (i.e., having a capacity of less than 119 gallons) are found in § 172.301. The 75 gallon capacity container is a non-bulk packaging, as defined in § 171.8, and must be marked with the proper shipping name and identification number. A product label may be used to satisfy the marking requirements on a non-bulk packaging, such as the 75 gallon capacity container, as long as it meets the general marking requirements in §§ 172.301 and 172.304.

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Delmer F. Billings". The signature is fluid and cursive, with the first name "Delmer" and last name "Billings" clearly distinguishable.

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards

11/02/2001 15:42 FAX

001/001

Engram
\$172.337
Labeling
01-0288

10040 Lickinghole Road
Ashland, VA 23005

ChemTreat, Inc. facsimile transmittal

To: Ben Fax:
From: John Mardigian Date: November 2, 2001
Re: Pages: CC:
☐ Urgent ☐ For Review ☒ Please Comment ☒ Please Reply ☐ Please Recycle

What are the proper labeling requirements for shipping IBCs (75-gallon, 275-gallon, 300-gallon, 400-gallon sizes?) Our practice has been that we stencil the proper shipping name on the tote, but the new totes don't have enough room on the marking plates for our current stencils (lettering requirement per DOT is 2" high letters).

However, this information is included on the product label which is affixed to the tote. Do we still need to stencil the proper shipping name on the IBC tote with 2" high letters? And if, stenciling IS required, can it be positioned from "top to bottom" as opposed to "left to right"? Could you please give me an official ruling.

My fax number is 804-798-2205. Please follow up with hard copy to:

John Mardigian
ChemTreat, Inc.
10040 Lickinghole Road
Ashland, VA 23005
Phone 804-935-2276